

Lila Ayers, Esq.
8 East Prospect Avenue, Suite A1
Mount Vernon, NY 10550
(914) 699-5220
lilaayerslaw@aol.com

April 16, 2025

Via ECF

Hon. Vera M. Scanlon, U.S.M.J.
United States District Court
Eastern District of New York

Re: Singh v. Topline NYC Contracting Inc., et al.
Case no. 1:25-CV-00776

Dear Magistrate Judge Scanlon:

The following is defendants' opposition to plaintiff's motion for leave (Doc. 21) to submit a reply in support of his motion for sanctions (Doc. 18).

Your Honor's rule about letter motions, III(b) could not be clearer: *No replies permitted*. Thus, it is borderline sanctionable conduct for plaintiff to now attempt to circumvent the rule. Significantly, none of the cases cited by plaintiff involve a party seeking to submit a reply letter where a judge's individual rules forbid it. Were this Court to grant plaintiff's motion, there would be precedent for a party to submit a reply and every letter motion *would generate two motions*: the motion itself and another motion to permit a reply.

Notably, plaintiff cites *no* authority for why his motion should be granted, because there is none. *See*, second to last paragraph of letter. (Doc. 21).

If I had my druthers, I would have preferred to submit a reply to my first motion (Doc. 16). Of course, I did not think to do so as I read your Honor's rule and abided by it.

In light of the above, this Court should not consider plaintiff's reply (Doc. 18) and should deny plaintiff's motion for leave to submit a reply. (Doc. 21).

Respectively submitted,

Lila Ayers

Lila Ayers

cc: Emmanuel Kataev, Esq.